

**BRAFMAN & ASSOCIATES, P.C.**

ATTORNEYS AT LAW  
767 THIRD AVENUE, 26TH FLOOR  
NEW YORK, NEW YORK 10017  
TELEPHONE: (212) 750-7800  
FACSIMILE: (212) 750-3906  
E-MAIL: ATTORNEYS@BRAFLAW.COM

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 3/3/2020

BENJAMIN BRAFMAN

MARK M. BAKER  
OF COUNSEL

MARC A. AGNIFILO  
OF COUNSEL

ANDREA L. ZELLAN  
JOSHUA D. KIRSHNER  
JACOB KAPLAN  
TENY R. GERAGOS  
ADMITTED IN NY & CA  
STUART GOLD

March 2, 2020

BY ECF

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMORANDUM ENDORSED**

Re: United States v. Natalie Mayflower Sours Edwards, 19 Cr. 64 (GHW)

Dear Judge Woods:

We represent the defendant in the above-referenced case. As part of the January 13, 2020, plea proceeding, this Court issued an Order referring the case to the Probation Department for a Presentence Investigation and Report. Under the current schedule, the Probation Department's first disclosure of their report is due March 6, 2020, with the second disclosure due April 3, 2020.

Since the plea proceeding, counsel has been in constant contact with U.S. Probation Officer Meaghan E. Biggs to schedule an interview with Mrs. Edwards. Unfortunately, Mrs. Edwards was unable to travel to New York from Virginia because of medical issues. Officer Biggs and counsel tried to arrange a phone interview with Mrs. Edwards but, unfortunately, Mrs. Edwards was diagnosed with pneumonia and was unable to participate in a phone interview.

Mrs. Edwards is now feeling better and is able to travel to New York. We are constrained, however, to request an adjournment of the disclosure dates to give the Probation Department adequate time to complete its investigation and draft its report. Accordingly, we request, with no objection from the government, that this Court extend the first disclosure due date to April 3, 2020, and extend the second disclosure date to May 1, 2020.

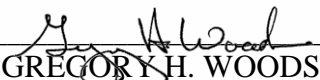
Application granted. The initial disclosure and final disclosure dates of the Pre-Sentence Investigation Report are extended to April 3, 2020 and May 1, 2020. The sentencing hearing is adjourned from June 9, 2020 to July 8, 2020 at 4:00 p.m. Defendant's sentencing memorandum is due June 24, 2020; the Government's memorandum is due July 1, 2020. The Clerk's Office is directed to terminate the motion at Dkt. No. 38.

Respectfully submitted,

  
Jacob Kaplan, Esq.

SO ORDERED.

Dated: March 3, 2020  
New York, New York

  
GREGORY H. WOODS  
United States District Judge